

Chapter VI: Other Than Full and Open Competition (OFOC) SOP  
Attachment 2: Request for Limited Sources Justification Format >\$150K

LIMITED SOURCES JUSTIFICATION

ORDER >\$150,000

FAR PART 8.405-6

Acquisition Plan Action ID: 688-17-2-1005-0010

This acquisition is conducted under the authority of the Multiple Award Schedule Program. The material or service listed in par. 3 below is sole source, therefore, consideration of the number of contractors required by FAR Subpart 8.4 – Federal Supply Schedules, is precluded for the reasons indicated below.

Restricted to the following source: Provide original manufacturer's name for material or contractor's name for service. (If a sole source manufacturer distributes via dealers, ALSO provide dealer information.)

Manufacturer/Contractor: National Associates, Inc. (NAI Personnel)

Manufacturer/Contractor POC & phone number: 1130 Connecticut Avenue, NW, Suite 530

Mfgr/Contractor Address: Washington, DC 20036

Dealer/Rep address/phone number: 202-223-7606

☐ The requested material or service represents the minimum requirements of the Government.

**(1) AGENCY AND CONTRACTING ACTIVITY:**

Department of Veterans Affairs

50 Irving Street, NW

Washington, DC 20422

VISN:

**(2) NATURE AND/OR DESCRIPTION OF ACTION BEING APPROVED:**

Geriatrics and Extended Care and the Fee Basis Program requires contract establishment for the following Personnel to effectively operate its various VACO mandated CHOICE programs: Ten (10) Full Time Administrative Support Personnel to provide data entry and validation for its Non Institutional Care (NIC) purchased care programs. Assistance in the effective management of these programs is necessary for these high cost (over \$20M/annum) Community Service programs for frail, elderly veterans.

**(3) (a) A DESCRIPTION OF THE SUPPLIES OR SERVICES REQUIRED TO MEET THE AGENCY'S NEED:**

Non Institutional Care (NIC) and Care in the Community staff are needed for tracking of invoice receipt and payment, fee basis invoice payment, DOMA data entry, DOMA updates, faxing, payment of fee basis invoices, Austin data transmission, assistance with audit completion and patient satisfaction surveys and triaging issues from the field as needed. The following CHOICE cares are included under this program: Allergy, Audiology, Behavioral Health Generic, Cardiac Rehab, Cardiology, Cardiothoracic Surgery, Chiropractic, Colonoscopy, Dental, Dermatology, Interventional Cardiology, Neurosurgery, Orthopedic Surgery, Vascular Surgery, Endocrinology, General Surgery, Geneticist, Gynecology, Hematology, Kinesiotherapy, Mammography, Maternity, MRI, Nephrology, Neurology, Neurosurgery, Occupational Therapy, Oncology.

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Ophthalmology, Ophthalmology Surgery, Optometry, Ortho Surgical, Orthopedics, Physical Therapy, Podiatry, Primary care, Psychiatry, Psychology, Pulmonary, Rheumatology, Skilled Home, Sleep Study, Speech Therapy, Urology, Vascular Surgery, Women Health

(b) ESTIMATED DOLLAR VALUE: \$74,194.6 per month for total of \$460,006.56

(c) REQUIRED DELIVERY DATE: February 21, 2017

(4) IDENTIFICATION OF THE JUSTIFICATION RATIONALE (SEE FAR 8.405-6), AND IF APPLICABLE, A DEMONSTRATION OF THE PROPOSED CONTRACTOR'S UNIQUE QUALIFICATIONS TO PROVIDE THE REQUIRED SUPPLY OR SERVICE. (CHECK ALL THAT APPLY AND COMPLETE)

☐ Specific characteristics of the material or service that limit the availability to a sole source (unique features, function of the item, etc.). Describe in detail why only this suggested source can furnish the requirements to the exclusion of other sources.  
Due to the critical nature of programs provided by Geriatrics and Extended Care service, a break in administrative support services would have a severe impact on direct patient care for veterans. Due to separation of duty guidelines implemented by the Chief Business Office, support personnel are needed to supplement authorizations, track and pay invoices, scheduling consults, release and medical records scanning. If support is not obtained to supplement critical diminishing staff the veterans risk not receiving critical services which include but is not limited to Home Health Aide services, Adult Day Care, Community Nursing Home assistance, Purchased Skilled Care, and Hospice care.

☐ A patent, copyright or proprietary data limits competition. The proprietary data is:  
(If FAR 8.405-6(a)(2)iii before posting. Do not include specific proprietary data. Only mention the type of equipment, procedure, etc. to show that proprietary supplies or services are being procured.)  
None

☐ These are "direct replacements" parts/components for existing equipment.  
None

☐ The material/service must be compatible in all aspects (form, fit and function) with existing systems presently installed/performing. Describe the equipment/function you have now and how the new item/service must coordinate, connect, or interface with the existing system.  
None

☐ The new work is a logical follow-on to an original Federal Supply Schedule order provided that the original order was placed in accordance with the applicable Federal Supply Schedule ordering procedures. The original order must not have been previously issued under sole source or limited source procedures.

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☒ An urgent and compelling need exists, and following the ordering procedures would result in unacceptable delays.

In the past year the Geriatrics department has lost 60 percent of its experienced administrative support staff. This staff is vital in providing telephone call triage, the payment and tracking of invoices, patient scheduling, insurance verification and complete department audits. Staff will obtain all medical records and complete scheduled consults greater than 90 days, process referrals, authorizations, clinical reviews and medical documentation.

The positions are currently being classified by the Human resources department in order to recruit qualified personnel, once the classification has been processed it is anticipated to take several months for review and approval. Once the vacancy announcement has been posted it is estimated to take 2-3 months for direct hire.

The clinic receives 30-40 patients daily as well as approximately 50-60 calls; losing 60% of its staff leaves only 40% to complete all tasks. There would be no way to keep up with the current or increased workload without additional staff. Allowing this shortage of staff to continue would ultimately adversely affect Veterans as well as Government staff. Supplementing Government staff with National Associates, Inc. (NAI) staff is crucial the needs of the clinic. NAI staff will enhance Government work performance since they are already trained and familiar with VA's operating procedures; NAI's knowledge will assist in avoiding a critical break in service and alleviate a drop in productivity.

Also, the Geriatrics department is authorized to use utilize special funding (Choice), but this must be done prior to August 7<sup>th</sup>, when funds are due to expire.

**(5) DESCRIBE WHY YOU BELIEVE THE ORDER REPRESENTS THE BEST VALUE CONSISTENT WITH FAR 8.4 TO AID THE CONTRACTING OFFICER IN MAKING THIS BEST VALUE DETERMINATION:**

Market research was performed among several SDVOSB -FSS contractors of the four (4) used to make a comparison only one (1) listed had the three (3) labor categories listed on its contract. The one that included all labor categories required was more than \$120,000 over NAI's projected price.

**(6) DESCRIBE THE MARKET RESEARCH CONDUCTED AMONG SCHEDULE HOLDERS AND THE RESULTS OR A STATEMENT OF THE REASON MARKET RESEARCH WAS NOT CONDUCTED:**

Market research indicates other companies' similar products, however the company requested has met the need with direct skilled setting for payments by way of CHOICE which is directly in the agency's needs.

**(7) ANY OTHER FACTS SUPPORTING THE JUSTIFICATION:**

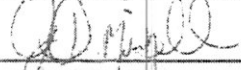
Memorandum (dated 10/21/16) signed by both Gene Migliaccio (Executive Director, Delivery Operations) and Brian A Hawkins ( VA Medical Center, Director) authorizing the Utilization of Choice funds for this specific (staffing) purposes.

**(8) A STATEMENT OF THE ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS THAT LED TO THE RESTRICTED CONSIDERATION BEFORE ANY SUBSEQUENT ACQUISITION FOR THE SUPPLIES OR SERVICES IS MADE:**

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For additional support needs requiring more than 6 months period of performance will be given enough procurement lead time to be processed as a full and open competitive process.

(9) **REQUIREMENTS CERTIFICATION:** I certify that the requirement outlined in this justification is a Bona Fide Need of the Department of Veterans Affairs and that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge. I understand that processing of this limited sources justification restricts consideration of Federal Supply Schedule contractors to fewer than the number required by FAR Subpart 8.4. *(This signature is the requestor's supervisor, fund control point official, chief of service or someone with responsibility and accountability.)*

  
\_\_\_\_\_  
SIGNATURE  
JACQUELINE D. MITCHELL  
NAME  
Program Management Analyst  
TITLE  
Geriatrics and Extended Care  
SERVICE LINE/SECTION  
688 - Washington DC Veteran Affairs Medical Center  
FACILITY

02/15/2017  
\_\_\_\_\_  
DATE

(10) **APPROVALS IN ACCORDANCE WITH THE VHAPM, Volume 6, Chapter VI: OFOC SOP:**

a. **CONTRACTING OFFICER'S CERTIFICATION (required):** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

  
\_\_\_\_\_  
CONTRACTING SPECIALIST  
February 15, 2017  
\_\_\_\_\_  
DATE

b. **Director of Contracting/DESIGNEE:** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

Gloria D. Prettiman  
1000088  
\_\_\_\_\_  
SIGNATURE  
NAME  
NCO 5  
Digitally signed by Gloria D. Prettiman 1000088  
DN: dc=gov, dc=va, o=internal, ou=people,  
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